

NOTICE OF EXEMPTION

PROJECT TITLE	Soil Binder Use During Fire Suppression Operations		
PROJECT LOCATION	In proximity to wildland fires throughout the state	COUNTY	Statewide
LEAD AGENCY	California Department of Forestry and Fire Protection (CAL FIRE)		
CONTACT	Dan Reese, Battalion Chief		
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PROJECT DESCRIPTION

Helicopters are often employed in controlling wildland fires to deliver fire suppression chemicals and to transport personnel and materials. Ideally, airports and large areas of concrete and pavement are the first choice to set up the helibases from which these aircraft operate. However, large fields and open wildland areas are often used due to their proximity to the fire. A helicopter's rotor wash causes a downdraft, producing large amounts of dust. Dust, if not abated, produces a hazardous condition called "brown out" wherein a pilot's vision may be impaired, potentially resulting in damage to the helicopter or a catastrophic crash. In addition, the dust may adversely impact the public and natural resources in the vicinity, including air and water quality. Likewise, heavy ground based fire equipment (fire engines, water tenders, dozer transports, etc.) travel convoy style on unsurfaced roads to and from the fire creating similar dust issues. Dust abatement at helibases and on road systems has traditionally been provided through the application of water by water tenders; however, reliance on water alone has resulted in less than satisfactory results. CAL FIRE proposes to rely instead on soil binders which are routinely used on construction projects to control dust arising from exposed soils or material stockpiles. Soil binders include both plant based (guar, psyllium, starch) and polymers (acrylic copolymers, polymers) that when applied to the soil provide temporary wind-induced erosion control far superior to water alone. The use of soil binders will decrease the amount of time and water that will be needed to abate the dust, improve safety, reduce environmental impacts and provide a significant cost savings to the state.

EXEMPTION STATUS Categorical Exemption Type/Section: §15330 Minor Actions to Prevent the Release of Hazardous Substances Statutory Exemption (state code section): Ministerial (§21080(b)(1); 15268) Declared Emergency (§21080(b)(3); 15269(a)) Emergency Project (§21080(b)(4); 15269(b)(c))

REASONS PROJECT IS EXEMPT

The Class 30 Categorical Exemption provides for the "Application of dust suppressants or dust binders to surface soils" [14 CCR 15330(b)(6)] to "prevent, minimize, stabilize, mitigate or eliminate the release ... of hazardous substances". CAL FIRE's use of soil binders will stabilize soils, thereby providing increased safety and efficiency during fire fighting operations while protecting other natural resources from airborne dust. Soil binders are designed to bind with soil particles and, as such, are unlikely to be transported offsite and delivered to water bodies. Soil binders would generally be used in areas that are largely devoid of native vegetation (e.g., parks, fair grounds, dirt lots, unsurfaced roads, grassy or barren areas) where their application is unlikely to create potential impacts to sensitive biological resources. As such, CAL FIRE finds that the use of soil binders, as described, meets the conditions of this Categorical Exemption and will not have a significant direct, indirect or cumulative effect on the environment.

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STATE CLEARING HOUSE

William E. Snyder, Deputy Director Date